

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

RANJITH KEERIKKATTIL

*Plaintiff,*

v.

FREEMAN A. HRABOWSKI, *et al.*  
*Defendants.*

FILED \* ENTERED  
LOGGED \* RECEIVED  
APR 22 2014  
CLERK U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
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**PLAINTIFF'S STATUS REPORT**

Pursuant to the Court's Order of October 8, 2013 and its amended order dated February 6, 2014, Plaintiff submits the following status report:

**PLAINTIFF'S STATEMENT**

- I. Plaintiff has completed responding to Defendants discovery requests. There are currently no outstanding discovery requests propounded by Defendants for Plaintiff to fulfill.
- II. Defendants have fulfilled most of Plaintiff's discovery requests except:
  1. Request to provide an updated and complete Privilege Log dated March 26, 2014.
  2. Request to Supplement Defendants' Response to Plaintiff's Second Set of Interrogatories dated March 13, 2014.

Counsel for the Defendants, Erik J. Delfosse informed Plaintiff by e-mail that he would "make all reasonable efforts" to fulfill the above outstanding requests

before the close of discovery. If the Plaintiff does not receive them by Friday, April 25, 2014, he intends to file a motion to compel and for an in camera review regarding any unsupported claims of privilege.

- III. Plaintiff intends to file a motion for summary judgment by May 24, 2014.
- IV. Plaintiff requests a trial by jury of all issues so triable and estimates 2-3 days to present his case.
- V. Plaintiff had written to Defendants' then counsel Katherine D. Bainbridge on October 18, 2013 indicating that he was interested in settlement talks with the Defendants. Ms. Bainbridge indicated that Defendants were not interested in a settlement. Defendants have since not indicated that they are interested in a settlement and it appears as if they have no interest in settling the case since they litigate on taxpayer's dime.
- VI. Plaintiff is willing to consider settlement/ADR conference as long as the process does not induce additional financial burden on him. Plaintiff hasn't seen any interest from the Defendants' side in settling the case to date, so he is highly skeptical if a settlement conference would be beneficial.
- VII. Plaintiff consents pursuant to 28 U.S.C. § 636(c), to have a U.S. Magistrate Judge conduct all further proceedings in this case.
- VIII. Plaintiff was unable to file this status report on April 21, 2014 since he was in Chicago for official purposes and does not have ECF privileges unlike Defendants' Counsel.

IX. Plaintiff had reached out to Defendants seeking updates on pending discovery requests and filing of this report as late as April 20, 2014. Since the Plaintiff hasn't heard back from Mr. Delfosse, he is filing his status report independently rather than as a joint one.

Respectfully submitted,



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*Plaintiff, pro se*

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 22<sup>nd</sup> day of April, 2014, a copy of the foregoing was served by first class mail and electronic mail to:

Erik J. Delfosse  
Assistant Attorney General  
Office of the Attorney General  
200 St. Paul Place, 17<sup>th</sup> Fl.  
Baltimore, Maryland 21202-2021  
edelfosse@oag.state.md.us

